

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MARILYN LUCEY,	)	Civil Action 04-CV-10800-NG
Plaintiff	)	
v.	)	
	)	
HARTFORD LIFE AND ACCIDENT	)	
INSURANCE COMPANY,	)	
Defendant	)	

**JOINT MOTION TO EXTEND FILING OF DISPOSITIVE MOTIONS**

NOW COME Plaintiff Marilyn Lucey and Defendant Hartford Life and Accident Insurance Company to jointly request an extension of time in which to file dispositive motions. In support hereof, the parties state the following.

1. At the status conference on October 15, 2004 the Court reviewed and declined to adopt the deadlines the parties proposed in their Joint Statement Regarding Pretrial Matters.
2. At the status conference on January 10, 2005, the Court recommended that the parties proceed using the case stated procedure.
3. Both parties anticipated that this matter would be returned to the District Court judge and assigned a new briefing schedule. Neither party was aware the Court had adopted July 1, 2005 as the deadline for filing dispositive motions.
4. In addition, the parties are engaging in settlement discussions.
5. Accordingly, the parties request that the date for filing briefs in accordance with the case stated procedure be revised to August 2, 2005.

WHEREFORE the parties jointly request the Court to grant an extension of time in which to file dispositive motions until August 2, 2005.

Respectfully submitted,  
Marilyn Lucey

By her attorneys,



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Hartford Life and Accident Insurance Co.

By its attorneys,



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Dated: June 22, 2005